

Of Corruption Yet". (the "Simon Report"<sup>92</sup>, attached as **Exhibit 22**) A further continuance of Oath's pattern of malice, the Simon Report makes the following comment without any basis, explanation or accuracy: "...the inexplicably stupid Carter Page."

116. On May 17, 2017, HuffPost Contributor Warren Goldstein published an article on HuffPost entitled "Trump's 'High Crimes' — Not Treason". (the "Goldstein Report"<sup>93</sup>, attached as **Exhibit 23**) The defamatory Goldstein Report falsely states the following about Dr. Page: "Trump and his sleazy minions (Paul Manafort, Carter Page, Michael Flynn, and Roger Stone—what a bunch!) really did give 'aid and comfort' to Vladimir Putin's efforts to weaken the United States".

117. HuffPost's Morning Email Editor Lauren Weber wrote "Friday's Morning Email: The Latest In The Trump-Comey Saga" which HuffPost published on May 19, 2017. (the "Weber Email"<sup>94</sup>, attached as **Exhibit 24**) The article falsely claims that "...many wonder why Trump continues to stand by the man despite denouncing his ties to Paul Manafort and Carter Page." Denounce is defined by Merriam-Webster dictionary as "to pronounce especially publicly to be blameworthy or evil".<sup>95</sup> Despite the extraordinary distractions that the malicious defamation carried out by Oath and RFE have previously created for the Trump Campaign and subsequently created for his Administration, Mr. Trump has never in any way denounced Dr. Page even though the two have never met.

118. On May 22, 2017, HuffPost Politics Managing Editor Amanda Terkel wrote an article that was published by HuffPost entitled: "Michael Flynn Pleads The Fifth And Refuses To Cooperate With Senate Russia Probe" (the "Terkel Report"<sup>96</sup>, attached as **Exhibit 25**) Continuing Oath's institutional pattern of malevolence and to help further solidify its indictment of Dr. Page, the Terkel Report defames Dr. Page by falsely claiming: "The Senate intelligence committee has also requested documents from former Trump adviser Carter Page, who is so far refusing to cooperate." Dr. Page has offered significant cooperation and a substantial quantity of documents to the U.S. Senate Select Committee on Intelligence ("SSCI") via their Chairman, Senator Richard Burr, their Vice Chairman, Senator Mark Warner and senior members of the SSCI staff.

119. In a June 2, 2017 HuffPost article by HuffPost Contributor Jon Hotchkiss entitled, "All The President's Miscreants, Lowlifes and Villains," (the "Hotchkiss Report"<sup>97</sup>, attached as

<sup>92</sup> [http://www.huffingtonpost.com/entry/the-tuesday-night-massacre\\_us\\_59132cc7e4b07e366cebb7d2](http://www.huffingtonpost.com/entry/the-tuesday-night-massacre_us_59132cc7e4b07e366cebb7d2)

<sup>93</sup> [http://www.huffingtonpost.com/entry/fridays-morning-email-the-latest-in-the-trump-comey-saga\\_us\\_591ecfae4b034684b0b8b18](http://www.huffingtonpost.com/entry/fridays-morning-email-the-latest-in-the-trump-comey-saga_us_591ecfae4b034684b0b8b18)

<sup>94</sup> [http://www.huffingtonpost.com/entry/fridays-morning-email-the-latest-in-the-trump-comey-saga\\_us\\_591ecfae4b034684b0b8b18](http://www.huffingtonpost.com/entry/fridays-morning-email-the-latest-in-the-trump-comey-saga_us_591ecfae4b034684b0b8b18)

<sup>95</sup> <https://www.merriam-webster.com/dictionary/denounce>

<sup>96</sup> [http://www.huffingtonpost.com/entry/michael-flynn-senate-intelligence\\_us\\_5922ea65e4b03b485cb33b4a](http://www.huffingtonpost.com/entry/michael-flynn-senate-intelligence_us_5922ea65e4b03b485cb33b4a)

<sup>97</sup> [http://www.huffingtonpost.com/entry/all-the-presidents-miscreants-lowlifes-and-villains\\_us\\_5931ae68e4b00573ab57a30f](http://www.huffingtonpost.com/entry/all-the-presidents-miscreants-lowlifes-and-villains_us_5931ae68e4b00573ab57a30f)

**Exhibit 26)** the Oath subsidiary falsely stated that Dr. Page's, "Secret service code name is: 'Gomer Pyle. But Dumber'."<sup>98</sup> Although Dr. Page has never received U.S. Secret Service protection, the only reason why he might have necessitated security support from the federal government initially originated as a result of terrorizations directly stemming from the 2016 Yahoo Report, the RFE Republication, the HuffPost Republication and other malicious false stories that stemmed from them following their publication by the Defendants in September 2016.

120. On July 30, 2017, HuffPost Contributor David Halperin wrote an article that HuffPost published entitled "Exxon-Treasury Fight And The Roots Of Russiagate" (the "Halperin Report"<sup>99</sup>, attached as **Exhibit 27**) Reciting from the 2016 Dodgy Dossier, the libelous Halperin Report repeats the same false statements made in the the 2016 Yahoo Report, the RFE Republication, and the HuffPost Republication nearly 10 months earlier: "the allegation that Trump campaign adviser Carter Page met last summer with Rosneft's president Sechin and a senior Russian government official and that 'Sechin's associate said that the Rosneft president was so keen to lift personal and corporate western sanctions imposed on the company, that he offered Page and his associates the brokerage of up to a 19 percent (privatized) stake in Rosneft. In return, Page had expressed interest and confirmed that were Trump elected U.S. president, then sanctions on Russia would be lifted.'"

121. As further continuation of Oath's relentless pattern of malice, the Halperin Report falsely concludes: "It's clear from all these episodes that the Russians have been focused like a laser on getting Donald Trump to lift or relax the U.S. sanctions."

#### Steps Taken by Dr. Page to Mitigate Life-Threatening Risks and Other Damages Through the Exhaustion of Administrative Remedies

122. Amidst these unrelenting malicious attacks by Defendant Oath's subsidiary HuffPost and since the Plaintiff did not qualify for U.S. Secret Service protection, Dr. Page agreed to interviews with various media outlets in the interest of setting the record straight regarding the defamatory statements by the Defendants and in an attempt to limit further damages from the 2016 Yahoo Report, the RFE Republication, the HuffPost Republication and other malicious false stories that stemmed from them. In addition to the severe harm to the Plaintiff, as a patriotic American veteran Dr. Page was also motivated in the interest of helping to repair some of the severe damage to the U.S. that the Defendants helped facilitate including the Witch Hunt against Dr. Page. Related media appearances included interviews with PBS<sup>100</sup>,

<sup>98</sup> [http://www.huffingtonpost.com/entry/all-the-presidents-miscreants-lowlifes-and-villains\\_us\\_5931ae68e4b00573ab57a30f](http://www.huffingtonpost.com/entry/all-the-presidents-miscreants-lowlifes-and-villains_us_5931ae68e4b00573ab57a30f)

<sup>99</sup> [http://www.huffingtonpost.com/entry/the-exxon-treasury-fight-and-the-roots-of-russiagate\\_us\\_597de928e4b0c69ef70528ff](http://www.huffingtonpost.com/entry/the-exxon-treasury-fight-and-the-roots-of-russiagate_us_597de928e4b0c69ef70528ff)

<sup>100</sup> <https://www.youtube.com/watch?v=bsgSl8s2GeM>

CNN<sup>101</sup>, MSNBC<sup>102</sup>, Fox News<sup>103</sup>, ABC News<sup>104</sup>, and others. Due to severe damage for the Plaintiff created by the Plaintiffs' reckless disregard for the truth that followed the 2016 Yahoo Report, the RFE Republication, the HuffPost Republication and other malicious false stories, the resulting death threats and damage suffered by Dr. Page continued following these appearances.

123. Due to the strong support that Mr. Armstrong, Mr. Isikoff and other Oath content providers have shown toward Mrs. Clinton,

#### Oath's and RFE's Defamation Relative to Corporate Policies and Procedures By Which They Are Governed

124. Extensive evidence that each of the Defendants acted with actual malice towards Dr. Page is found in the fact that the defamatory articles violate their own policies and procedures, which forbid the conduct of these media institutions here and label it intolerable.

125. Further evidence that Oath's subsidiary Yahoo acted with actual malice towards Dr. Page is the fact that the 2016 Yahoo Report violates Yahoo's own policies and procedures on many counts, which forbid Yahoo's conduct here and label it intolerable. In its handbook entitled "Winning with Integrity - Yahoo!'s Code of Ethics"<sup>105</sup> (attached as **Exhibit 28**), Yahoo professes:

## Winning with Integrity

Yahoos,

Yahoo! is the place where millions of people go to see what is happening with the people and the things that matter to them most. We must do everything possible to continue to earn and keep their trust. *Our conduct must always reflect Yahoo!'s values*, demonstrate ethical leadership *and uphold Yahoo!'s reputation for integrity*.

We are committed to the highest standards of business conduct in our relationships with each other, our users, our stockholders and our customers, suppliers and partners. *This Code of Ethics applies to all Yahoos and provides the information necessary to fulfill our obligations to act with integrity and in compliance with the laws and regulations that affect our business.*

<sup>101</sup> <https://www.youtube.com/watch?v=82ZcZ7s-3O8>

<sup>102</sup> <http://www.msnbc.com/all-in/watch/carter-page-i-don-t-deny-meeting-with-russian-ambassador-889043011736>

<sup>103</sup> <http://video.foxnews.com/v/5379272731001/>

<sup>104</sup> <http://abcnews.go.com/Politics/trump-associate-denies-middle-man-russia/story>

<sup>105</sup> "Yahoo's Code of Ethics: Winning with Integrity".

<http://files.shareholder.com/downloads/YHOO/660619262x0x239565/4f32ddd0-82e5-47c2-ac71-75403ebbb404>

...

- *We aspire to flawless execution and **don't take shortcuts on quality**.*
- *We are flexible and learn from our mistakes.*

...

***...Conduct business with honesty and integrity and refrain from doing anything that would harm our reputation.***

...

*Avoid exaggerating, making derogatory characterizations of people or companies, or drawing legal conclusions in business records and communications (including email, IMs, voicemail, blogs, twikis, and informal memos, regardless of intended distribution).*

...

*Communicating consistent and accurate information to the public is vital to our image and is required to meet regulatory and legal obligations.*

...

As Yahoos, *we conduct business honestly and fairly*, and we don't provide or offer anything of value to **anyone** in exchange for a favorable decision or to secure favorable treatment...

*Before making any kind of payment or offering anything of value to a government official or official of any company or entity that may be directly or indirectly owned by the government*, for any reason, you must consult with the ECO<sup>106</sup> and obtain approval in advance, in writing.

## Political Activities and Contributions

*Various laws restrict us from using Yahoo! funds, assets, services, or facilities **on behalf of a political party or candidate**.*

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<sup>106</sup> “Yahoo!’s Ethics and Compliance Office,” Ibid, p. 1.

## ***Human Rights***

Yahoo! supports the idea that *our users, wherever located, should enjoy fundamental rights to free expression and that those rights are essential to human dignity*. We are committed to doing our utmost to help protect those rights through thoughtful, responsible business decisions and processes, and *rigorous application of the laws that protect those rights. If you become aware of government actions that you believe may conflict with our support of these fundamental rights, email the Business & Human Rights Program at HumanRights@yahoo-inc.com.*

....

## **Q&A**

**Q:** A friend of mine is running for political office, and I would like to help her out with her campaign. Is there a problem with this?

**A:** No. Your personal support is your personal business. *Just make sure you do not use Yahoo! assets – including Yahoo! company time or the Yahoo! name – to advance the campaign.*

(Emphasis added)

126. Oath's HuffPost includes no ethical standards for this subsidiary on their website per se, but rather includes the disclaimer in its User Agreement/Terms and Conditions (the "HuffPost User Agreement", attached as **Exhibit 29**): "We are an Internet Service Provider, e.g., We are Not Responsible For and Do Not Necessarily Hold the Opinions Expressed by Our Content Contributors".<sup>107</sup>

127. HuffPost does acknowledge: "We reserve the right to remove or not publish submissions without prior notice."

128. Contrary to HuffPost's legal guise as operating solely an Internet Service Provider, the new HuffPost Editor in Chief Lydia Polgreen was quoted in a December 2016 *New York Times* article<sup>108</sup> (the "HuffPost Times Article") as stating that: "To me this felt like an unmissable opportunity to take a massive journalistic platform that was at an inflection point and think about what the possibilities are of what it could be." Jared Grusd, Chief Executive of HuffPost confirmed these objectives, while acknowledging HuffPost's political agenda: "We were looking for someone who has tremendous integrity, with deep roots in the process of journalism and the way in which journalism needs to function... She's somebody who can carry

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<sup>107</sup> <http://www.huffingtonpost.com/static/terms>

<sup>108</sup> <http://www.huffingtonpost.com/author/lydia>

our voice, and translate our narratives, across fundamental shifts in the media landscape and the political landscape.”<sup>109</sup>

129. Further evidence that Oath and their subsidiaries including Yahoo and HuffPost acted with actual malice towards Dr. Page is the fact that the 2016 Yahoo Report, the HuffPost Republication and other defamatory articles also violate their parent company Verizon’s own policies and procedures. The “Verizon Credo” highlights the importance of “**Integrity. Respect. Performance Excellence. Accountability.**” According to the “Verizon Credo”:

## We are Verizon.

### We believe integrity is at the core of who we are.

It establishes the trust that is critical to the relationships we have. We are committed to do the right thing and follow sound business practices in dealing with our customers, suppliers, owners and competitors. Our competitors are not enemies; they are challengers who drive us to improve. We are good corporate citizens and share our success with the community to make the world in which we work better than it was yesterday.

130. Verizon’s Chairman and Chief Executive Officer Lowell C. McAdam (“Mr. McAdam”) states in his introductory letter to the “Verizon Code of Conduct”. In addition to various alleged potential conflicts of interest described in an April 13, 2016 article by the American news website Salon, entitled, “Hillary Clinton rakes in Verizon cash while Bernie Sanders supports company’s striking workers: Verizon paid Hillary \$225,000 for speech and poured money into Clinton Foundation. Executives give to her campaign”,<sup>110</sup> Mr. McAdam personally made a political contribution to the Hillary for America campaign of \$2,700 on May 31, 2016<sup>111</sup> and a second political contribution to the Clinton Campaign of \$2,700 on October 20, 2016<sup>112</sup>:

In the words of the Verizon Credo, integrity is at the core of who we are. It’s one of our foundational values and a crucial factor in establishing the trust that underlies our relationships with customers, suppliers and colleagues. **For us to be successful in the**

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<sup>109</sup> <https://www.nytimes.com/2016/12/06/business/media/huffington-post-hires-senior-new-york-times-editor.html>

<sup>110</sup>

[http://www.salon.com/2016/04/13/hillary\\_clinton\\_rakes\\_in\\_verizon\\_cash\\_while\\_bernie\\_sanders\\_supports\\_companys\\_striking\\_workers/](http://www.salon.com/2016/04/13/hillary_clinton_rakes_in_verizon_cash_while_bernie_sanders_supports_companys_striking_workers/)

<sup>111</sup> <https://www.campaignmoney.com/political/contributions/lowell-mcadam.asp?cycle=16>

<sup>112</sup> <https://www.campaignmoney.com/political/contributions/lowell-mcadam.asp?cycle=16>

*digital marketplace, we must make sure the Verizon brand is synonymous with trust, integrity and the highest of ethical standards.*

Each of us is accountable for living up to these high standards every day, in all our actions.

(Emphasis added)

131. The “Verizon Code of Conduct” forbids the conduct displayed in the 2016 Yahoo Report, the HuffPost Republication and other defamatory HuffPost articles, and label it intolerable. The Code states<sup>113</sup> (attached as **Exhibit 30**):

**Do the Right Thing Because it's the Right Thing to Do**

... You must report suspected and actual violations of this Code, company policy and the law. Verizon will investigate reported instances of questionable or unethical behavior.

In deciding whether a violation of the Code has occurred or is about to occur, you should first ask yourself:

- **Could this conduct be viewed as dishonest, unethical or unlawful?**
- Could this conduct hurt Verizon? Could it cause Verizon to lose credibility with its customers, business providers or investors?
- **Could this conduct hurt other people**, such as other employees, investors or customers?

...

### **2.2.2 Contributions of Corporate Assets**

**You may not make payments of** corporate contributions, whether monetary or **non-monetary assets, to any domestic or foreign political party, candidate, campaign or public official unless that contribution is permitted under applicable laws inside and outside the U.S., and approved in advance by the Public Policy, Law and Security Department.** In addition, you may never reimburse anyone for any political contribution.

...

### **4.2.2 Classified and National Security Information**

You must take all necessary steps to protect classified and national security information and you must coordinate all activities related to this information with Security and Legal Department personnel who have appropriate clearance. It is never appropriate to disclose this information to another person without explicit approval from the Legal Department.

(Emphasis added)

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<sup>113</sup>

<https://www.verizon.com/about/sites/default/files/Verizon-Code-of-Conduct.pdf>

132. According to U.S. law (22 U.S.C. 6202), the following “Standards and principles shall apply to the United States international broadcasting that has been and continues to be overseen by BBG:”

- (1) be consistent with the broad foreign policy objectives of the United States;
- (2) be consistent with the international telecommunications policies and treaty obligations of the United States;
- (3) ***not duplicate the activities of private United States broadcasters;***
- (4) not duplicate the activities of government supported broadcasting entities of other democratic nations;
- (5) ***be conducted in accordance with the highest professional standards of broadcast journalism;***
- (6) ***be based on reliable information about its potential audience;***
- (7) be designed so as to effectively reach a significant audience; and
- (8) ***promote respect for human rights***, including freedom of religion.

(Emphasis added)

133. According to a May 2015 report addressed to Mr. Shell and signed by the U.S. Department of State’s Office of Inspector General (“OIG”) entitled “Management Alert: Broadcasting Board of Governors Significant Management Weaknesses”<sup>114</sup> (the “May 2015 OIG Report”), BBG’s pattern of incompetence relative to the standards and principles required of BBG’s management and grantees fall far short of the requirements set by law and thereby leading to the direct threats to Dr. Page’s life and personal property in the publication of the RFE Republication in September 2016, and the RFE Pre-Election Report of November 6, 2016:

OIG has reported in a number of audits and inspections that BBG does not have sufficient oversight of the three grantees it funds through annual agreements: Radio Free Europe/Radio Liberty (RFE/RL)... Grants present special oversight challenges because, unlike contracts, grants do not generally require the recipient to deliver any specific goods or services to the Government.”

134. Enabled by BBG’s lack of management oversight and generous cash flow of US federal government spending, extensive evidence that BBG grantee RFE acted with actual malice towards Dr. Page is further demonstrated in the fact that the RFE Republication violates a vast array of RFE’s own policies and procedures on many counts. The diversity of offenses committed against Dr. Page encompass nearly the entirety of the associated RFE/RL Policies and Procedures document and expressly forbid RFE’s conduct here and label it intolerable. In its document entitled “RFE/RL Code of Professional Journalism (Section 2.2 of RFE/RL Policies and Procedures)”<sup>115</sup> (the “RFE Code of Professional Journalism”, attached as **Exhibit 31**), RFE demands:

## Accuracy

<sup>114</sup> <https://oig.state.gov/system/files/ma-15-01.pdf>

<sup>115</sup> [https://docs.rferl.org/en-US/professional\\_code.pdf](https://docs.rferl.org/en-US/professional_code.pdf)

- » *RFE/RL journalists and regional analysts will do their utmost to ensure that all broadcasts and publications (including those transmitted via the Internet) are factually accurate.* Where doubt or controversy may exist on significant points of fact, *information must be based on at least two independent sources.*
- » *RFE/RL journalists and regional analysts will not broadcast or publish material that is based on rumor or unsubstantiated information.*
- » *Factual errors will be corrected as soon as possible.*

### Impartiality

- » *Information will be presented in a factual context that enhances understanding of the events and issues and provides clarity without distortion or bias.*
- » Journalists and analysts will present opposing or differing views accurately and in a balanced manner on all issues, providing perspective to audiences and not merely platforms or positions. When groups or individuals whose views are important for balanced programming decline to comment, it is appropriate to note this in the story or article.
- » *RFE/RL shall be independent from any political party*, ruling or opposition group, emigre organization, commercial or other special-interest organization, or religious body, whether inside or outside the set of countries to which RFE/RL broadcasts radio or television programming (the "Broadcast Area"); and shall not endorse or advocate any specific political, economic, or religious viewpoint.

...

### Tone of Moderation and Respect

- » Broadcasts and publications shall at all times maintain a calm and moderate tone and project a model of civilized, reasoned discourse and a *respect for the human rights of all persons*. Broadcasts and publications shall not contain religious, ethnic, socio-economic, or cultural slurs upon any person or groups and shall observe common standards of etiquette and taste.
- » *Broadcasts and publications shall not contain material that could be construed as inflammatory or as incitement to violence. Programming on disturbances or other tense situations must be balanced and factual.*

### Avoidance of Advocacy

- » *RFE/RL supports democracy and the human rights common to democratic states.* However, RFE/RL shall not advocate the adoption of specific policies or legislation, *nor shall programming endorse or oppose candidates for elective or appointed office.*

...

### Ethical Conduct

- » *RFE/RL staff and contributors to programs and publications shall maintain the highest ethical standards in all conduct, taking particular care to avoid any conflict of interest, or the appearance thereof, in their relations with individuals, groups, political or commercial interests inside or outside the Broadcast Area.* RFE/RL staff and contributors shall in no way abuse their status as public figures or the

good reputation of RFE/RL to promote personal interest or gain. See policy on Conflict of Interest (RFE/RL Policies & Procedures, Section 3.5.2).  
(Emphasis added)

135. Dr. Page is the sole shareholder in GEC. Given GEC's businesses focus on working with corporations and financial institutions as a trusted advisor and partner, their reputation for providing services has been carefully cultivated and is paramount to the success of the business.

136. Similarly, prior to the Defendants' publication of life-threatening defamatory allegations and related misinformation, Dr. Page's own professional reputation had been untarnished and key to his ability to building GEC as an international financial institution. As a direct result of the 2016 Yahoo Report, the RFE Republication, the HuffPost Republication and other defamatory articles by the Defendants, GEC suffered, and will continue to suffer, actual injury as a result of injury to its corporate reputation. At least three banks and diversified financial services companies have declined to do business with GEC based on the defamatory statements published by the Defendants and, on information and belief, the defamatory statements have also cost GEC clients.

#### Assessing Oath's and RFE's Activities and Intentions in the 2016 U.S. Election

137. An assessment issued on January 6, 2017 by the Obama Administration's Office of the Director of National Intelligence ("DNI") in Washington defined an intelligence community framework for the analysis of alleged activities and intentions of state actors in the 2016 U.S. election (the "DNI Report").<sup>116</sup> Given Defendants BBG grants to RFE as a U.S. government-funded broadcasting organization as well as the track record of Oath subsidiaries' as agents of influence, cutouts, front organizations, and participants in false-flag operations in 2016, the DNI Report provides an insightful basis for assessing the activities and intentions related to the RFE Republications as well as the other defamatory publications from Oath.

138. The DNI Report noted that derogatory news by government-funded propaganda outlets "likely aimed at undermining viewers' trust in US democratic procedures". BBG and RFE played precisely that role in devising tactics which the DNI Report accurately refers to as "influence campaigns [that] are multifaceted and designed to be deniable because they use a mix of agents of influence, cutouts, front organizations, and false-flag operations." The 2016 Yahoo Report and the HuffPost Republication played a similar role in the 2016 election.

139. The DNI Report also warns about the impact or potential impact of "paid social media users or 'trolls'". The role of HuffPost Contributors in their defamatory reports on Dr. Page

140. Consistent with the many baseless defamatory attacks on Dr. Page in the RFE Republications funded by BBG, the DNI Report explains tendencies in which government "leadership invests significant resources in both foreign and domestic propaganda and places a

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<sup>116</sup> [https://www.dni.gov/files/documents/ICA\\_2017\\_01.pdf](https://www.dni.gov/files/documents/ICA_2017_01.pdf)

premium on transmitting what it views as consistent, self-reinforcing narratives regarding its desires".

141. In addition to Verizon's flattering AOL Clinton Documentary that Mr. Armstrong introduced at the Clinton-Armstrong Event, Oath's MAKERS website includes a diverse array of videos promoting Mrs. Clinton. The lead interview in this selection starts with a quote in which Mrs. Clinton suggested that, "The 20<sup>th</sup> century was about ending totalitarianism."<sup>117</sup> The reckless, fictional reports funded, managed and published by BBG, Oath, Yahoo, RFE, and HuffPost created an extraordinary level of damage and inspired terror threats against Dr. Page in the United States. The Defendants' practices of baseless defamation bear close resemblance to the definition of 20<sup>th</sup> totalitarianism, according to political theorists and analysts cited in *The Oxford Handbook of Political Ideologies*:

"Hannah Arendt described how totalitarianism broke down the distinction between legality and illegality, so that ordinary citizens never knew which side of the law they were on, a law that changed at the whim of the regime so that it perpetuated a state of terror and disorientation.... The source of the power of totalitarian regimes was their ideology, which provided single answers to the past, present, and future."<sup>118</sup>

### **Oath Should Not Profit at Dr. Page's Significant Expense**

142. With the 2016 Yahoo Report and the large-scale online promotion techniques by which Oath, Yahoo and HuffPost marked the defamatory allegations in the days and months following publication of the multiple reports, Oath and its subsidiaries Yahoo and HuffPost put profit and politics above its self-professed principles.

143. This is particularly troubling given that, in this year of Oath's official launch, the company's executive leadership had pledged to dedicate itself to creating a so-called "values-based brand".<sup>119</sup>

144. In this instance, Oath is the power that must be held to account and, consistent with its pledge, should accept full economic and journalistic responsibility for the falsehoods in the 2016 Yahoo Report, Schulberg Report, the Grim Report, the Terkel Report, the Marans Report, the Fuller Report, the Gruber Report, the Lance Report, Simon Report, the Goldstein Report, the Hotchkiss Report, the Halperin Report and others defamatory postings by which Oath profited from these fictional publications that contributed to the creation or perpetuation of terrorist threats aimed at Dr. Page.

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<sup>117</sup> <https://www.makers.com/hillary-rodham-clinton>

<sup>118</sup> Michael Freeden, Lyman Tower Sargent, and Marc Stears, Editors, *The Oxford Handbook of Political Ideologies*, Oxford: Oxford University Press.

<sup>119</sup> <https://www.cnbc.com/video/2017/04/04/oath-to-oversee-yahoo-and-aol-brand-tim-armstrong.html>

145. Oath and its subsidiary brands knew that the defamatory statements they distributed about Dr. Page would be viewed by millions of people. Oath and its subsidiaries also knew that their defamatory reports would be forwarded or republished by Mrs. Clinton's campaign, U.S. Government actors funded by BBG including RFE, numerous other news outlets and websites, both because of the horrific conduct ascribed to Dr. Page in connection with the most prominent news story of the past year, and also because such re-publication is a part of Oath's and Verizon's conscious business strategy.

146. Oath and its subsidiary brands actively promoted the 2016 Yahoo Report on social media, including on Mr. Isikoff's Twitter feed, as did RFE and the Clinton Campaign.

147. Not surprisingly, the widely circulated and heavily promoted 2016 Yahoo Report, the RFE Republication, the HuffPost Republication and other malicious false stories resulted in hatred, hostility and death threats directed toward Dr. Page.

148. As one example, several television networks including MSNBC seized on Yahoo's narrative about Dr. Page, tagging Dr. Page with the false link between Dr. Page and the alleged attempts at Russian influence on the 2016 election.

149. As set forth in the above-referenced ethical standards and policies, which RFE, Oath subsidiaries Yahoo and HuffPost adopted and expect themselves and others to follow regarding supposed "values" which the Defendants did not exhibit here. These standards included the Verizon Code of Conduct, Verizon Credo, RFE/RL Code of Professional Journalism,

150. When RFE and Oath's Yahoo and HuffPost misrepresented the source of falsehoods about Dr. Page, they also used their loud and far-reaching voices to inflict wounds which brought significant risk and pains for Dr. Page.

151. As a direct and proximate result of Oath's and RFE's intentional and malicious misconduct, Dr. Page suffered anguish, humiliation, embarrassment and damage to his reputation – all of which are continuing in nature and will be suffered in the future.

152. As a direct and proximate result of Oath's intentional and malicious misconduct, and their subsidiaries' deliberate abuse of Dr. Page's name, Oath also reaped ill-gotten gains from Internet advertising on the 2016 Yahoo Report, the HuffPost Republication and other defamatory HuffPost articles, which under the unique and special circumstances of this case, should be disgorged. Many of the printed versions of the aforementioned Exhibits including samples of the defamatory Yahoo and HuffPost reports display advertising from numerous companies as per the small sample included below. Some of the advertisers featured herein the associated Exhibits by Oath subsidiaries include but are not limited to:

- The fifth-largest food and beverage company in the world Kraft Heinz Company's<sup>120</sup> subsidiary meat producer Oscar Mayer (advertised in the 2016 Yahoo Report),

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<sup>120</sup> <http://ir.kraftheinzcompany.com/overview.cfm>

- German car company BMW AG's subsidiary MINI (advertised in the Schulberg Report),
- online real estate database company Zillow Group (advertised in the Schulberg Report),
- financial services conglomerate Popular Community Bank (advertised in the Grim Report),
- media conglomerate Liberty Interactive Corporation's e-commerce company Zulily (advertised in the Grim Report, the Sabin Report, the Weber Email, the Terkel Report),
- Affinia Hotel Collection property Shelburne NYC (advertised in the Marans Report),
- consumer retail company Williams-Sonoma Inc.'s subsidiary home furnishing store chain Pottery Barn,
- German automobile manufacturer Audi AG (advertised in the Fuller Report),
- American pulp and paper company Georgia-Pacific LLC's Brawny brand (advertised in the Fuller Report),
- multinational conglomerate holding company Berkshire Hathaway Inc.'s battery manufacturing company Duracell Inc. (advertised in the Graber Report),
- Japanese automaker Nissan's Infiniti luxury vehicle division,
- specialty retailer and direct marketer of women's clothing Talbots Inc., a portfolio company of private equity firm Sycamore Partners (advertised in the Lance Report),
- Graham Holdings Company's for-profit education subsidiary Kaplan Inc. (advertised in the Simon Report),
- hospitality holding corporation Choice Hotels International Inc. (advertised in the Goldstein Report),
- multinational financial services corporation The American Express Company (advertised in the Terkel Report),
- marketing lead generator and licensed mortgage broker LendingTree LLC (advertised in the Goldstein Report),
- American dental equipment maker Dentsply Sirona Inc. (advertised in the Hotchkiss Report),
- online retail company MeCommerce Inc.'s bra shopping website ThirdLove (advertised in the Hotchkiss Report), and
- diversified global insurer Liberty Mutual Holding Company's Liberty Mutual Insurance (advertised in the Halperin Report).

153. Oath should not be permitted to profit from the vast portfolio of defamatory articles printed about Dr. Page with malice and with the knowledge that the falsehoods first originating from Oath in September 2016 through their defamatory and life-threatening publications will drive viewership and web clicks.

**COUNT 1**  
**Defamation and Defamation Per Se Against Oath, and RFE**

154. Plaintiff re-alleges and re-asserts the allegations set forth in paragraphs 1 to 0 as if fully set forth herein.

155. Defendants Oath and RFE, by and through their representatives, published or caused to be published false and defamatory statements concerning the Plaintiff without privilege to do so.

156. The false and defamatory statements included, but are not limited to, allegations that Dr. Page may have committed crimes, and/or supported cyberattacks that preceded the 2016 U.S. Presidential election.

157. The defamatory statements were published without privilege to third parties, including millions of people.

158. The defamatory statements were made negligently; without reasonable care as to their truth or falsity; with knowledge of their falsity; and/or with reckless disregard for the truth.

159. The statements are of the kind that they would tend to prejudice the Plaintiff in the eyes of a substantial and respectable minority of his community.

160. The statements have caused, and will continue to cause, the Plaintiff injury in his personal, social, and business relations.

161. Dr. Page has suffered, and will continue to suffer, actual injury as a result of the injury to his personal reputation.

162. The defamatory statements tend to injure the Plaintiff in his business trade as the allegations call into question the trustworthiness of the Plaintiff. Additionally, the above statements subject Plaintiff to distrust, scorn, ridicule, hatred, contempt and death threats. As such, the defamatory statements constitute defamation per se.

163. In addition, as a direct and proximate result of the defamatory statements made by Defendants, Plaintiff has suffered, and continue to suffer, substantial damages.

164. It is clear from the statements made by Oath media assets including Yahoo and HuffPost, discussed above, and BBG's grantee RFE, that they had actual knowledge of the wrongfulness of their conduct and the high probability that injury or damage to the Plaintiff would result and that, despite that knowledge, the Defendants intentionally pursued that course of conduct, resulting in injury or damage.

**COUNT 2**  
**Acts of Terrorism Transcending National Boundaries Against Oath, and BBG**

165. Dr. Page re-alleges and incorporates by reference the allegations in paragraphs 1 to 0 as if stated herein.

166. The defamatory statements by the Oath and BBG's grantee RFE created a substantial risk of serious bodily injury to Dr. Page by attempting or conspiring to destroy or damage Dr. Page's personal property within the United States, including but not limited to Dr. Page's reputation, relationships and physical belongings.

167. The defamatory statements obstruct, delay, or affect Dr. Page's prospective interstate or foreign commerce.

168. The defamatory statements involve acts dangerous to human life that are a violation of the laws of the United States and New York State.

169. The statements appear to be intended to intimidate or coerce the civilian population of the United States and foreign countries.

170. The continued publication of the defamatory statements beginning on or about January 20, 2017, appear to be intended to influence the policy of a government by intimidation or coercion.

171. The defamatory statements occurred primarily within the territorial jurisdiction of the United States but were further distributed across Europe and worldwide.

172. The defamatory statements demonstrate a reckless disregard for the risk of causing such terror or inconvenience.

**COUNT 3**  
**Financing of Terrorism Against BBG**

173. Dr. Page re-alleges and incorporates by reference the allegations in paragraphs 1 to 0 as if stated herein.

174. BBG directly or indirectly, unlawfully and willfully provided funds to grantee RFE with the intention that such funds be used, or with the knowledge that such funds are to in part be used in order to carry out the distribution of defamatory reports including the RFE Republication and the RFE Pre-Election Report, intended to cause death or serious bodily injury to Dr. Page.

175. As an American military veteran who has spent much of the last twenty years of his life working to establish peace in his community and in the world through the empowerment of individuals and non-hostile commercial enterprises, Dr. Page is a person who has not taken any active part in hostilities in any situation of armed conflict at any time since his honorable discharge from the U.S. Navy in 1998.

176. BBG's purpose of funding activities that enabled the RFE Republication and the RFE Pre-Election Report, by its nature or context, was to intimidate the population of U.S. voters

and other members of their audience prior to the 2016 election with fears related to the Witch Hunt, and/or to compel the Russian Government to do or to abstain from doing alleged acts related to cyberattacks that Dr. Page no part in and had no advance knowledge of.

177. BBG funds were actually used by BBG's grantee RFE to create and distribute the RFE Republication and the RFE Pre-Election Report that helped inspire multiple threats to Dr. Page's life, in conjunction with other publications by non-state actors in the form of private United States broadcasters including Oath brands that concurrently distributed the false allegations cited in RFE's duplicated broadcasts via the internet and other media forms.

**COUNT 4**  
**Tortious Interference Against Oath, and RFE**

178. Dr. Page re-alleges and incorporates by reference the allegations in paragraphs 1 to 0 as if stated herein.

179. Dr. Page had existing and prospective business relationships with energy companies and financial institutions. These business relationships were well-established as Dr. Page's experience in energy finance transactions had occurred over 10 years. Dr. Page's relationships included, but were not limited to, the following energy companies: Chesapeake Energy, KazMunayGas, Tatneft, and Gazprom. Dr. Page's relationships included, but were not limited to, the following financial institutions: Deutsche Bank, Goldman Sachs, Citi, Mubadala Development Company, China Investment Corporation, Canaccord Genuity, HSBC, Piper Jaffray Companies, Ladenburg Thalman, Morgan Stanley and others.

180. The Defendants knew that Dr. Page had business relationships with international energy companies and financial institutions as indicated in their false statements about his relationship with Rosneft. The Defendants via their brands, subsidiaries and grantees then intentionally and unjustifiably interfered with Dr. Page's existing and prospective business relationships with energy companies.

181. First, the Defendants engaged in a disinformation campaign during its news reports before and after the 2016 Yahoo Report, the RFE Republication, the HuffPost Republication, RFE Pre-Election Report and continuing through at least July 30, 2017, with actual malice where they falsely stated and/or implied that Dr. Page may have engaged in efforts to disrupt the 2016 U.S. Presidential Election on behalf of the Russian Government. This disinformation campaign created a client, investor and financing backlash against Dr. Page, GEC and GEC's partners, and against those companies with which Dr. Page maintained relationships including Gazprom, which the Defendants continued to provoke false, defamatory published statements by Oath and BBG.

182. Second, the Defendants contributed to the incitement of a so-called "resistance" movement related in part to the Witch Hunt that started in September 2016 with Dr. Page as the central target, forcing Dr. Page and GEC to stop pursuing business opportunities based on consumer concern.

183. Third, the Defendants repeatedly broadcast and publicized false or misleading regular updates regarding the alleged Witch Hunt against Dr. Page and other members of the Trump Movement in an effort to create increased ad revenue for Oath Media Massacre Tactics.

184. As a direct result of the Defendants' tortious interference with Dr. Page's existing and prospective business relationships, Dr. Page has suffered actual and consequential damages in an amount that will be proven at trial.

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Carter Page, demands judgment against Defendants Oath, Inc., and RFE/RL, Inc., as follows:

- i. For an award of compensatory, special and punitive damages in amounts to be established at trial and in excess of seventy-five thousand dollars (\$75,000.00) in accordance with proof at trial together with interest thereon at the maximum legal rate; and Plaintiff reserve the right to seek leave of court to seek punitive damages against Defendants in accordance with the facts and claims stated herein and established through discovery;
- ii. For costs of suit incurred herein; and
- iii. For such other and further relief as to this Court may deem just and proper to protect Plaintiff's rights and interests.

#### DEMAND FOR JURY TRIAL

Plaintiff hereby demand a trial by jury on all issues so triable. Respectfully submitted this 14th day of September, 2017 by:

The Plaintiff,  
By: /s/ Carter Page  
Carter Page

  
c/o Global Energy Capital LLC  
590 Madison Ave., 21st floor  
New York, NY 10022  
Phone (212) 537-9261  
Fax (212) 537-9281  
cpage@globalenergycap.com

## EXHIBIT 1

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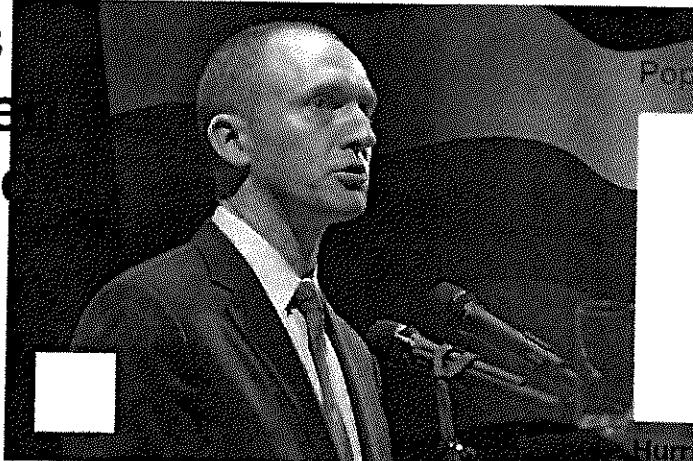
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# U.S. intel officials probe ties between Trump adviser and Kremlin

Michael Isikoff

Chief Investigative Correspondent

September 23, 2016



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U.S. intelligence officials are investigating whether an American businessman identified by Donald Trump as one of his foreign policy advisers has opened up private communications with senior Russian officials — including talks about the possible lifting of economic sanctions if the Republican nominee becomes president, according to multiple sources who have been briefed on the issue.

U.S. intelligence officials are seeking to determine whether an American businessman identified by Donald Trump as one of his foreign policy advisers has opened up private communications with senior Russian officials — including talks about the possible lifting of economic sanctions if the Republican nominee becomes president, according to multiple sources who have been briefed on the issue.

The activities of Trump adviser Carter Page, who has extensive business interests in Russia, have been discussed with senior members of Congress during recent briefings about suspected efforts

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Moscow to influence the presidential election, the sources said. After one of those briefings, Senate minority leader Harry Reid wrote FBI Director James Comey, citing reports of meetings between a Trump adviser (a reference to Page) and "high ranking sanctioned individuals" in Moscow over the summer as evidence of "significant and disturbing ties" between the Trump campaign and the Kremlin that needed to be investigated by the bureau.

Some of those briefed were "taken aback" when they learned about Page's contacts in Moscow, viewing them as a possible back channel to the Russians that could undercut U.S. foreign policy, said a congressional source familiar with the briefings but who asked for anonymity due to the sensitivity of the subject. The source added that U.S. officials in the briefings indicated that intelligence reports about the adviser's talks with senior Russian officials close to President Vladimir Putin were being "actively monitored and investigated."

A senior U.S. law enforcement official did not dispute that characterization when asked for comment by Yahoo News. "It's on our radar screen," said the official about Page's contacts with Russian officials. "It's being looked at."

Page is a former Merrill Lynch investment banker in Moscow who now runs a New York consulting firm, Global Energy Capital, located around the corner from Trump Tower, that specializes in oil and gas deals in Russia and other Central Asian countries. He declined repeated requests to comment for **Monica Lewinsky Finally Confirms The Rumors**

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Trump first mentioned Page's name when asked to identify his "foreign policy team" during an interview with the Washington Post editorial team last Ma

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**Monica Lewinsky Finally Confirms The Rumors**

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Describing him then only as a "PhD," Trump named Page as among five advisers "that we are dealing with." But his precise role in the campaign remains unclear; Trump spokeswoman Hope Hicks last month called him an "informal foreign adviser" who "does not speak for Mr. Trump or the campaign." Asked this week by Yahoo News, Trump campaign spokesman Jason Miller said Page "has no role" and added: "We are not aware of any of his activities, past or present." Miller did not respond when asked why Trump had previously described Page as one of his advisers.

### Everything you need to know about Hurricane Harvey

Donald Trump (Photo: Jonathan Ernst/Reuters)

### Luis Fonsi On Justin Bieber's Spanish 'Despacito' Hitting No. 1

The questions about Page come amid mounting concerns within the U.S. intelligence community about Russian cyberattacks on the Democratic National Committee and state election databases in Arizona and Illinois. In a rare public talk this week, former undersecretary of defense for intelligence Mike Vickers said that the Russian cyberattacks constituted meddling in the U.S. election and were "beyond the pale." Also, this week, two senior Democrats — Sen. Dianne Feinstein, ranking minority member on the Senate Intelligence Committee, and Rep. Adam Schiff, ranking minority member on the House Intelligence Committee —

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released a joint statement that went further than what U.S. officials had publicly said about the matter.

*"Based on briefings we have received,*

*we have concluded that the Russian intelligence agencies are making a serious and concerted effort to influence the U.S. election," they said.*

*"At the least, this effort is intended to sow doubt about the security of our election and may well be intended to influence the outcomes of the election."*

*They added that "orders for the Russian intelligence agencies to conduct such actions could come only from very senior levels of the Russian government,"*

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Page came to the attention of officials at the U.S. Embassy in Moscow several years ago when he showed up in the Russian capital during several business trips and made provocative public comments critical of U.S. policy and sympathetic to Putin. "He was pretty much a brazen apologist for anything Moscow did," said one U.S. official who served in Russia at the time.

**Psychiatrists tell Congress Donald Trump a clear and present danger to the world**

He hasn't been shy about expressing those views in the U.S. as well. Last March, shortly after he was named by Trump as one of his advisers, Page told Bloomberg News he had been an adviser to, an investor in, Gazprom, the Russian state-owned company. He then blamed Obama administration sanctions — imposed as a response to the Russian annexation of Crimea — for driving down the company's stock. "So many people who I know and have worked with have been so adversely affected by the sanctions policy," Page said in the interview.

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"There's a lot of excitement in terms of the possibilities for creating a better situation."

Page showed up again in Moscow in early July, two weeks before the Republican National Convention formally nominated Trump for president and once again criticized U.S. policy. Speaking ~~25th anniversary of Hurricane Andrew~~ <sup>look back</sup> at the commencement address for the New Economic School, an institution funded in part by major Russian oligarchs close to Putin, Page asserted "Washington and other West capitals" had impeded progress in Russia "through their often hypocritical focus on ideas such as democratization, inequality, corruption and regime change."

At the time, Page declined to say whether he would be meeting with Russian officials during his trip, according to a Reuters report.

**Homeland security adviser says Pres Trump prepared to respond to Hurricane Harvey**

*Trump's chief legal adviser, with Vladimir Putin, on a stage at the St. Petersburg International Economic Forum, 2014. (Photo: Sergei Karpov/Reuters)*

But U.S. officials have since received intelligence reports that during that same three-day trip, Page met with Igor Sechin, a longtime Putin associate and former Russian deputy prime minister who is now the executive chairman of Rosneft, Russia's leading oil company, a well-placed

Western intelligence source tells Yahoo News. That meeting, if confirmed, is viewed as especially problematic by U.S. officials because the Treasury Department in August 2014 named Sechin to a list of Russian officials and businessmen sanctioned over Russia's "illegitimate and unlawful actions in the Ukraine." (The Treasury announcement described Sechin as "utterly loyal to Vladimir Putin — a key component to his current standing." At their alleged meeting, Sechin raised the issue of the lifting of sanctions with Page, the Western intelligence source said.

U.S. intelligence agencies have also received reports that Page met with another top Putin aide while in Moscow — Igor Diveykin. A former Russian security official, Diveykin now serves as deputy chief for internal policy and is believed by U.S. officials to have responsibility for intelligence collected by Russian agencies about the U.S. election, the Western intelligence source said.

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## EXHIBIT 2